

REPRESENTOR: 3RD TEDDINGTON SCOUT GROUP: MELANIE SPENCER, GROUP SCOUT LEADER

HEARING 5, 9TH OCTOBER: ITEM 8

On behalf of our Executive Committee and 98 members, 3rd Teddington Scout Group made verbal and written representations objecting to the proposed designation of the former ICL ground on Udney Park Road, Teddington, as Local Green Space. I asked to attend the oral examination in my representation but have decided to submit this written statement instead.

I have read the other representations made to Richmond Council on this matter, including those by Robin Meakins, on behalf of the Quantum Group, and the Teddington Community Sports Ground CIC. Their representations echo our views that the LGS criteria had not been achieved and, therefore, that the basis on which the Council made its decision is not sound. We support their representations.

Following the Council's response to our representation (LBR-LP-003) and the Inspector's questions with reference to L13 and Local Green Space (ID-6A, Hearing 5, 9th Oct, point 8), we still believe the Council's decision is not sound and not supported with proportionate evidence.

We believe the evidence base for LP13 is not robust for the following points:

LGS CRITERIA

THE SITE IS SUBMITTED BY THE LOCAL COMMUNITY

The Council refers to the Friends of Udney Park Playing Fields as "having circa 300 households as registered supporters" and Teddington Society "by far the largest community group in the locality." We ask what proof is there that Teddington Society members supported this application? And how many? We know Teddington Society members who were not consulted on the LGS application.

PUBLIC CONSULTATION

During the Regulation 19 consultation from 4 Jan to 15 Feb 2017, more than 1,000 people explicitly wrote in to reject the LGS designation. Based on the published comments, the count of people rejecting the LGS is significantly higher than those proposing it. We do not believe the Council put sufficient weight on the more than 1,000 objections. With this level of objection, the Council should seek wider consultation before this designation change can be finally considered.

SITE IS LOCAL IN CHARACTER AND IS NOT AN EXTENSIVE TRACT OF LAND

Criterion states: "where the site is not publicly accessible, it is within reasonably close proximity to the community it serves". The Council recognises that "the playing fields are not publicly accessible, however, they are reasonably close to the community it serves." We agree with the Council that this central Teddington site is reasonably close by foot, bus, train, cycle or car to local residents. However, this space does not "serve" a local community as it is private land and has been little used in the past. It is misleading to claim that this meets the criteria.

THE LOCAL GREEN SPACE IS DEMONSTRABLY SPECIAL TO A LOCAL COMMUNITY

The Council states the site is overlooked by local property on 4 sides. But it goes on to say (Council response to ID 4) "the local green space provides a healthy break in the built up area of Central Teddington" and "they (the playing fields) play a significant role in the local community." Excepting for the temporary use granted by the site owners, this is a closed private site NOT accessible to the public and not providing any healthy breaks or role in the community. This is precisely why the designation should not be tightened further.

With reference to the Inspector's questions: How is the approach to LGS designed to work in practice? What evidence underpins the policy formation in this regard? We make the following points:

THE LOCAL GREEN SPACE DESIGNATION WOULD PROVIDE PROTECTION ADDITIONAL TO ANY EXISTING PROTECTIVE POLICIES

The Council has not provided evidence why it is deemed necessary to add this extra protection – it seems unnecessary and far too restrictive. It appears to work against the Council's expressed policy (LP31) to improve existing facilities and spaces, including their openness and character and their

accessibility since it will make it even harder to bring a private site into public sport and recreation use.

We note the Council also uses the following statements to support the LGS designation: that the playing fields “have the future potential to play a significant role in the community,” and that “it is not the role of the Plan-making process to assess a potential development.” The Council has not made any representation on how the future potential of the site can be realised under a LGS designation.

In its response to our representation (LBR-LP-003) the Council, under LP28, states that it will “work with service providers and developers to ensure adequate provision of community services and facilities, especially where there is an identified need or shortage.” Our need was identified in early 2016 and despite two searches, one Council assisted, no alternative accommodation for our group has been identified. As evidenced by the written comments to Regulation 19 consultation, we are not the only community and sports group in this situation to ask that the Council reconsider its LGS designation and consider working with this developer to address this need. Without access to the site, and despite ever increasing membership and waiting lists, our nearly 100 year-old Scout group will have to close.

Designating this site as LGS does not make it publically accessible, nor will it benefit the community beyond those that live on its boundary.

The best chance to secure more than 75% of the site (9.5 acres) as public space, playing fields and community facilities is as part of an enabling mixed development. Such a development will allow the Scouts, sports and other community groups to have a long term sustainable future on this site. The LGS designation will result in the loss of these much needed facilities and the site will remain a closed wasted/wasting area.

We urge the Council to remove the additional hurdle of a LGS designation and use existing regulations (OOLTI) to ensure a measured and appropriate development and to secure 9.5 acres of recreational and community space for Teddington in perpetuity.

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